

CLARE E. CONNORS 7936  
Attorney General of Hawaii

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Attorneys for Defendant  
CLARE E. CONNORS, in her  
Official Capacity as the Attorney  
General of the State of Hawaii

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

TODD YUKUTAKE and DAVID  
KIKUKAWA,

Plaintiffs,

vs.

CLARE E. CONNORS, in her  
Official Capacity as the Attorney  
General of the State of Hawaii and the  
CITY and COUNTY OF  
HONOLULU,

Defendants.

CIVIL NO. 19-00578 JMS-RT

DEFENDANT CLARE E. CONNORS,  
IN HER OFFICIAL CAPACITY AS  
THE ATTORNEY GENERAL OF THE  
STATE OF HAWAII'S INITIAL  
DISCLOSURES; CERTIFICATE OF  
SERVICE

No Trial Date

DEFENDANT CLARE E. CONNORS, IN HER OFFICIAL CAPACITY  
AS THE ATTORNEY GENERAL OF THE STATE OF HAWAII'S  
INITIAL DISCLOSURES

Defendant Clare E. Connors, in her Official Capacity as the Attorney General of the State of Hawaii, by and through her attorneys, Caron M. Inagaki and Kendall J. Moser, Deputy Attorneys General, hereby submits her Initial Disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure.

I. INDIVIDUALS WITH DISCOVERABLE INFORMATION

To date, the Attorney General is unaware of anyone from the State of Hawaii who has discoverable information regarding the issues raised by the Plaintiffs in their Verified Complaint for Declaratory and Injunctive Relief.

II. DOCUMENTS AND THINGS

The Attorney General will make the relevant documents and things in her possession, custody, or control, if any, available to the parties at a mutually agreeable time and place.

III. DAMAGES

The Attorney General is not seeking damages other than the costs of suit.

IV. INSURANCE

The State of Hawaii is self-insured to \$5,000,000.00 and has excess coverage above that amount.

DATED: Honolulu, Hawaii, December 20, 2019.

STATE OF HAWAII

CLARE E. CONNORS  
Attorney General  
State of Hawaii

/s/ Kendall J. Moser  
KENDALL J. MOSER  
Deputy Attorney General

Attorney for Defendant  
CLARE E. CONNORS, in her  
Official Capacity as the Attorney  
General of the State of Hawaii